

Title:	Water Hygiene Policy
Issue Date:	January 2024
Effective Date:	Immediately
Document Owner:	Kathleen Henriques-Brown
Post of Document Owner:	Health, Safety and Compliance manager
Date Approved by EMT:	22 January 2024
Date Approved by Board:	10 April 2024
Version number	2
Date of Next Review	April 2027

#### 1. Introduction

- 1.1 Legionella is a bacterium that can cause Legionnaires' disease, a potentially fatal form of pneumonia, when water contaminated with Legionella is inhaled in tiny droplets of water.
- 1.2 WPH recognises the importance of protecting all its residents, employees, contractors and others affected by its work activities from the risk from Legionella and the need for robust water hygiene management.
- 1.3 WPH is committed to achieving compliance with all its statutory, regulatory and other responsibilities associated with Water Hygiene and Legionella control.

# 2. Purpose

- 2.1 The purpose of this policy is to ensure that WPH:
  - Complies with its legal duties relating to water system safety;
  - Takes reasonable steps to prevent the development and spread of Legionella in the water systems for which it is responsible;
  - Protects its residents, employees, contractors and others affected by its works activities, from the ill health associated with Legionella;

## 3. Scope

- 3.1 This policy applies to any use or storage of hot and/or cold water that is owned, managed, maintained or controlled, to any extent, by Women's Pioneer housing, that could result in the formation and/or transmission of water droplets (aerosols) which may be inhaled by any person, thereby creating a reasonably foreseeable risk of exposure to legionella bacteria.
- 3.2 This policy applies to all properties owned and managed by Women's Pioneer Housing and Women's Pioneer Homes. It does not include Leasehold properties unless the water is supplied from a communal system.

## 4. Legislation/Regulation

4.1 WPH will comply with all legislation and relevant good practice guidance relating to water hygiene within domestic premises.

## 5. Background

5.1 This policy forms part of a suite of Health and Safety policies and procedures that reduces the risk of harm to residents, visitors, staff and contractors, working and living within WPH properties. This policy helps to achieve Corporate Plan Objective 1 'Providing high quality homes and services',

# 6. Responsibilities

- 6.1 Under the Health and Safety legislation, organisations are required to identify a structure of responsibilities for health and safety activities. At WPH the responsibilities are as follows:
  - Duty Holder Chief Executive
  - Responsible Person Head of Contracts, Compliance and Property Services
  - Deputy responsibility Health Safety and Compliance Manager
- 6.2 Day to day management is the responsibility of the health, Safety and Compliance manager, supported by suitably qualified consultants.
- 6.3 Leaseholders are responsible for the quality of the water systems within their flats unless it is connected to a communal system. We will remind leaseholders of this responsibility.

## 7. The Policy

## 7.1 Policy Statement

7.1.1 WPH is committed to reducing, so far as is reasonably practicable, the reasonably foreseeable risks of exposure of any person to legionella bacteria within the properties for which it is responsible. WPH will aim to achieve this policy commitment by following the principles set out in the publication "Legionnaires' disease. The control of legionella bacteria in water systems.

Approved Code of Practice and guidance L8 (Fourth Edition). Health and Safety Executive (HSE)".

## 7.2 Risk assessments

- 7.2.1 WPH will arrange for a suitable and sufficient Legionella Risk Assessment (LRA) to be carried out by a competent person, to all WPH properties with a communal water system, at intervals no greater than 2 years.
- 7.2.2 WPH will identify any particular groups of people who may be at higher risk of harm if exposed to legionella bacteria.
- 7.2.3 A UKAS accredited laboratory will be appointed to carry out tests on any water samples taken.
- 7.2.4 LRA's will be downloaded into C365 and a copy held in ALPHA Tracker (contractor database).
- 7.2.5 Any remedial works that are identified by the LRA will be recorded and remedied within the timescale required.
- 7.2.6 In the event of a positive result following water testing, measures will be taken immediately to mitigate any risk to residents, staff, visitors or contractors.
- 7.3 Water Hygiene Management Plan
- 7.3.1 WPH will prepare a suitable management plan to cover all buildings that will outline the measures to be taken for appropriate water hygiene management.
- 7.3.2 WPH will appoint suitably qualified and trained people to manage the risk.
- 7.4 Maintenance
- 7.4.1 WPH will take all reasonable steps to keep the water systems in good condition by carrying out appropriate maintenance and monitoring.
- 7.4.2 All void flats and any water outlets that are little used, will be flushed on a weekly basis to reduce the risk of a build-up of legionella bacteria.
- 7.4.3 Where communal showers are provided, these will be cleaned thoroughly on a quarterly basis.
- 7.4.4 All showerheads within Void Properties will be replaced
- 7.4.5 Flow Test Reports will be completed within Void Properties
- 7.4.6 Hot water will be stored at a temperature not less than 60 degrees centigrade on communal systems. Cold water will be stored at a temperature less than 20 degrees centigrade in communal systems.
- 7.4.7 WPH will only use Contractors to carry out work on water systems who are suitably qualified and experienced in identifying risks associated with legionella

- bacteria and we will encourage membership of the Legionella Control Association.
- 7.4.6 When major works are being carried out within a flat or communal area, consideration will be given to removing any cold-water storage tanks and converting the system to mains pressure where appropriate.
- 7.5 Recording and reporting
- 7.5.1 WPH will maintain suitable records and review periodically. These records will be audited on a regular basis by the internal auditors appointed by WPH.
- 7.5.2 WPH will create a register of all buildings requiring an LRA. An asset register will also be created to identify equipment and components requiring regular maintenance to reduce the risk of Legionella.
- 7.5.3 Performance will be reported against the relevant KPI's.
- 7.5.4 Monthly reports will be prepared for SMT and at all board meetings.
- 7.5.5 In the event of a positive results from a water test or other event that may increase the risk of harm to residents, visitors, staff and contractors, a report will be provided to SMT immediately.

#### 8. Training

8.1 Legionella awareness training will be provided to all staff who have specific or general duties relating to health and safety within WPH buildings.

#### 9. Contact officer

9.1.1 For any further information or queries relating to this policy, please contact Kathleen Henriques-Brown, Health, Safety and Compliance manager. Kathleen.Henriques-Brown@womenspioneer.co.uk